

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>No. 08 CR 207</b>
<b>v.</b>	)	
	)	<b>Judge Milton Shadur</b>
<b>ANDRE LINEAR, Defendant.</b>	)	

**DEFENDANT ANDRE LINEAR'S MOTION TO MODIFY THE CONDITIONS OF HIS  
BOND TO REMOVE THE CONDITION THAT HE WEAR AN ANKLE BRACELET**

The defendant, by his Court appointed attorney, Ronald J. Clark, hereby, moves this Court to modify the conditions of his pretrial release to remove the condition that he wear an ankle bracelet. In support of this motion, the Defendant states:

1. On March 11, 2008, the Defendant was indicted and charged with one count of being a convicted felon in possession of a firearm.
2. Shortly after his indictment, he came before this Court and was admitted to bond, a condition of which was that he wear a monitoring device. Since that time the Defendant has been in full compliance with the Orders of this Court and of pretrial services.
3. The Defendant has recently enrolled in school and has been working. The ankle bracelet which he was ordered to wear currently poses a problem for pretrial services and the Defendant in his work and school schedule. The Defendant's Pretrial Services Officer wholly concurs with this request, stating that it would be best for the Defendant and that given the level of his cooperation with Pretrial Services, he deserves it. The granting of this request would greatly free up resources of Pretrial Services to be applied to cases where such monitoring is better warranted.

**WHEREFORE**, the Defendant respectfully requests that the Court modify the conditions of his bond to eliminate the requirement of home monitoring with an ankle bracelet.

Respectfully submitted,

s/Ronald J. Clark

Ronald J. Clark, Attorney for Defendant

Ronald J. Clark  
Attorney for Andre Linear  
820 West Jackson Blvd  
Suite 300  
Chicago, Illinois 60604  
312-307-0061

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<b>ANDRE LINEAR,</b>	)	

**NOTICE OF FILING**

To: John F. Podliska  
Assistant United States Attorney  
219 South Dearborn Street 5<sup>th</sup> Floor  
Chicago, Illinois 60604

Please take Notice that on Tuesday, July 29, 2008, I filed Defendant Linear's Motion to Modify the Conditions of Bond which I will present at the upcoming status of Wednesday, July, 30, 2008, A copy is herewith served upon you.

**CERTIFICATE OF SERVICE**

Ronald J. Clark, an attorney hereby certifies that he served a copy of this Notice and the Document referred to therein to the person set out above on Tuesday, July 29, 2008, by electronic filing.

Respectively submitted,

s/Ronald J. Clark  
Ronald J. Clark  
Attorney for Defendant

Ronald J. Clark  
Attorney for Defendant Andre Linear  
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